Statement of Basis of the Federal Operating Permit

GB Biosciences Corporation

Site/Area Name: Utilities / Wastewater / Stormwater
Physical location: 2239 Haden Road
Nearest City: Houston
County: Harris

Permit Number: O2267
Project Type: Renewal

Standard Industrial Classification (SIC) Code: 2879
SIC Name: Pesticides and Agricultural Chemicals

This Statement of Basis sets forth the legal and factual basis for the draft permit conditions in accordance with 30 TAC §122.201(a)(4). Per 30 TAC §§ 122.241 and 243, the permit holder has submitted an application under § 122.134 for permit renewal. This document may include the following information:

A description of the facility/area process description;
A basis for applying permit shields;
A list of the federal regulatory applicability determinations;
A table listing the determination of applicable requirements;
A list of the New Source Review Requirements;
The rationale for periodic monitoring methods selected;
The rationale for compliance assurance methods selected;
A compliance status; and
A list of available unit attribute forms.

Prepared on: May 19, 2015

Operating Permit
Basis of Determination

Permit Area Process Description

The GBB Wastewater Treatment System consists of two processes which treat water prior to discharge from the site. The two processes are the wastewater treatment systems (WTS) and storm water treatment system (STS). The waters handled by these systems originate from the operating facilities at the Greens Bayou site, as well as, from non-manufacturing plant areas.

The WTS consists of multiple treatment operations: including pH adjustment/control, removal of metals, and suspended solids, VOC separation, biological systems, clarification, filtration, and adsorption. The water source include: contact and noncontact process water, contaminated groundwater, rainwater falling in contained areas, and utility blow down. The removal of VOCs achieved by air stripping contaminated water of volatile organic material in a packed column. The gas effluent from the column is de-humidified, and routed through carbon adsorption to control emissions. Tanks containing volatile organic liquids are vented to this emissions control system. The biological treatment section of the process utilizes an activated sludge technology in a sequencing batch reactor system.
Storm water which falls on uncurbed plant areas is collected in concrete sewers and ditches. Water collected in these areas can be treated by either the WTS or the STS. The STS consists of multiple treatment operations: including pH adjustment/control, removal of metals, removal of suspended solids, clarification, and filtration. WTS and STS facilities consist, primarily, of tanks used to process the water through the different stages of treatment. Additionally, tanks are needed for the storage of the chemicals used to facilitate each of the processing steps, which includes facilities for acid, caustic, ferric chloride solutions, and polymers.

The GBB Utilities unit consists of general facilities located at the Greens Bayou site. These include: emergency power generation equipment, emergency fire water equipment, fuel storage tanks, sand blasting and painting facilities, acid and caustic storage tanks, industrial and potable water distribution systems, chloride supply systems, laboratory facilities, and cooling towers. Additionally, the utilities unit includes the plant roadways, parking facilities, warehouses, maintenance shops, office buildings, and non-manufacturing areas. The emergency power and fire water systems are the only combustion sources in this unit. Small gasoline and diesel storage tanks provide fuel to the emergency equipment and for use by in-plant motor vehicles. The sand blasting area utilizes a baghouse for controlling particulate emissions. The chloride supply system includes railcar unloading and supply to other facilities at the GBB Greens Bayou site. Caustic scrubbers are used to control chloride emissions from the unloading system.

FOPs at Site

The "application area" consists of the emission units and that portion of the site included in the application and this permit. Multiple FOPs may be issued to a site in accordance with 30 TAC § 122.201(e). When there is only one area for the site, then the application information and permit will include all units at the site. Additional FOPs that exist at the site, if any, are listed below.

Additional FOPs: O2264, O2265, O2266

Major Source Pollutants

The table below specifies the pollutants for which the site is a major source:

Major Pollutants	VOC, SO2, PM, NOX, HAPS

Reading State of Texas's Federal Operating Permit

The Title V Federal Operating Permit (FOP) lists all state and federal air emission regulations and New Source Review (NSR) authorizations (collectively known as "applicable requirements") that apply at a particular site or

permit area (in the event a site has multiple FOPs). **The FOP does not authorize new emissions or new construction activities.** The FOP begins with an introductory page which is common to all Title V permits. This page gives the details of the company, states the authority of the issuing agency, requires the company to operate in accordance with this permit and 30 Texas Administrative Code (TAC) Chapter 122, requires adherence with NSR requirements of 30 TAC Chapter 116, and finally indicates the permit number and the issuance date.

This is followed by the table of contents, which is generally composed of the following elements. Not all permits will have all of the elements.

- General Terms and Conditions
- Special Terms and Conditions
    - Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting
    - Additional Monitoring Requirements
    - New Source Review Authorization Requirements
    - Compliance Requirements
    - Protection of Stratosphere Ozone
    - Permit Location
    - Permit Shield (30 TAC § 122.148)
- Attachments
    - Applicable Requirements Summary
        - Unit Summary
        - Applicable Requirements Summary
    - Additional Monitoring Requirements
    - Permit Shield
    - New Source Review Authorization References
    - Compliance Plan
    - Alternative Requirements
- Appendix A
    - Acronym list

General Terms and Conditions

The General Terms and Conditions are the same and appear in all permits. The first paragraph lists the specific citations for 30 TAC Chapter 122 requirements that apply to all Title V permit holders. The second paragraph describes the requirements for record retention. The third paragraph provides details for voiding the permit, if applicable. The fourth paragraph states that the permit holder shall comply with the requirements of 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit. The fifth paragraph provides details on submission of reports required by the permit.

Special Terms and Conditions

Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting. The TCEQ has designated certain applicable requirements as site-wide requirements. A site-wide requirement is a requirement that applies uniformly to all the units or activities at the site. Units with only site-wide requirements are addressed on Form OP-REQ1 and are not required to be listed separately on an OP-UA Form or Form OP-SUM. Form OP-SUM must list all units addressed in the application and provide identifying information, applicable OP-UA Forms, and preconstruction authorizations. The various OP-UA Forms provide the characteristics of each unit from which applicable requirements are established. Some exceptions exist as a few units may have both site-wide requirements and unit specific requirements.

Other conditions. The other entries under special terms and conditions are in general terms referring to compliance with the more detailed data listed in the attachments.

Attachments

Applicable Requirements Summary. The first attachment, the Applicable Requirements Summary, has two tables, addressing unit specific requirements. The first table, the Unit Summary, includes a list of units with applicable requirements, the unit type, the applicable regulation, and the requirement driver. The intent of the requirement driver is to inform the reader that a given unit may have several different operating scenarios and the differences between those operating scenarios.

The applicable requirements summary table provides the detailed citations of the rules that apply to the various units. For each unit and operating scenario, there is an added modifier called the "index number," detailed citations specifying monitoring and testing requirements, recordkeeping requirements, and reporting requirements. The data for this table are based on data supplied by the applicant on the OP-SUM and various OP-UA forms.

Additional Monitoring Requirement. The next attachment includes additional monitoring the applicant must perform to ensure compliance with the applicable standard. Compliance assurance monitoring (CAM) is often required to provide a reasonable assurance of compliance with applicable emission limitations/standards for large emission units that use control devices to achieve compliance with applicant requirements. When necessary, periodic monitoring (PM) requirements are specified for certain parameters (i.e. feed rates, flow rates, temperature, fuel type and consumption, etc.) to determine if a term and condition or emission unit is operating within specified limits to control emissions. These additional monitoring approaches may be required for two reasons. First, the applicable rules do not adequately specify monitoring requirements (exception- Maximum Achievable Control Technology Standards (MACTs) generally have sufficient monitoring), and second, monitoring may be required to fill gaps in the monitoring requirements of certain applicable requirements. In situations where the NSR permit is the applicable requirement requiring extra monitoring for a specific emission unit, the preferred solution is to have the monitoring requirements in the NSR permit updated so that all NSR requirements are consolidated in the NSR permit.

Permit Shield. A permit may or may not have a permit shield, depending on whether an applicant has applied for, and justified the granting of, a permit shield. A permit shield is a special condition included in the permit document stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirement(s) or specified applicable state-only requirement(s).

New Source Review Authorization References. All activities which are related to emissions in the state of Texas must have a NSR authorization prior to beginning construction. This section lists all units in the permit and the NSR authorization that allowed the unit to be constructed or modified. Units that do not have unit specific applicable requirements other than the NSR authorization do not need to be listed in this attachment. While NSR permits are not physically a part of the Title V permit, they are legally incorporated into the Title V permit by reference. Those NSR permits whose emissions exceed certain PSD/NA thresholds must also undergo a Federal review of federally regulated pollutants in addition to review for state regulated pollutants.

Compliance Plan. A permit may have a compliance schedule attachment for listing corrective actions plans for any emission unit that is out of compliance with an applicable requirement.

Alternative Requirements. This attachment will list any alternative monitoring plans or alternative means of compliance for applicable requirements that have been approved by the EPA Administrator and/or the TCEQ Executive Director.

Appendix A

Acronym list. This attachment lists the common acronyms used when discussing the FOPs.

Stationary vents subject to 30 TAC Chapter 111, Subchapter A, § 111.111(a)(1)(B) addressed in the Special Terms and Conditions

The site contains stationary vents with a flowrate less than 100,000 actual cubic feet per minute (acfm) and constructed either before or after January 31, 1972 which are limited, over a six-minute average, to 20% opacity as required by 30 TAC § 111.111(a)(1)(B). As a site may have a large number of stationary vents that fall into this category, they are not required to be listed individually in the permit's Applicable Requirement Summary. This is consistent with EPA's White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995, that states that requirements that apply identically to emission units at a site can be treated on a generic basis such as source-wide opacity limits.

Periodic monitoring is specified in Special Term and Condition 3.A for stationary vents subject to 30 TAC § 111.111(a)(1)(B) to verify compliance with the 20% opacity limit. These vents are not expected to produce visible emissions during normal operation. The TCEQ evaluated the probability of these sources violating the opacity standards and determined that there is a very low potential that an opacity standard would be exceeded. It was determined that continuous monitoring for these sources is not warranted as there would be very limited environmental benefit in continuously monitoring sources that have a low potential to produce visible emissions. Therefore, the TCEQ set the visible observation monitoring frequency for these sources to once per calendar quarter.

The TCEQ has exempted vents that are not capable of producing visible emissions from periodic monitoring requirements. These vents include sources of colorless VOCs, non-fuming liquids, and other materials that cannot produce emissions that obstruct the transmission of light. Passive ventilation vents, such as plumbing vents, are also included in this category. Since this category of vents are not capable of producing opacity due to the physical or chemical characteristics of the emission source, periodic monitoring is not required as it would not yield any additional data to assure compliance with the 20% opacity standard of 30 TAC § 111.111(a)(1)(B).

In the event that visible emissions are detected, either through the quarterly observation or other credible evidence, such as observations from company personnel, the permit holder shall either report a deviation or perform a Test Method 9 observation to determine the opacity consistent with the 6-minute averaging time specified in 30 TAC § 111.111(a)(1)(B). An additional provision is included to monitor combustion sources more frequently than quarterly if alternate fuels are burned for periods greater than 24 consecutive hours. This will address possible emissions that may arise when switching fuel types.

Federal Regulatory Applicability Determinations

The following chart summarizes the applicability of the principal air pollution regulatory programs to the permit area:

Regulatory Program	Applicability (Yes/No)
Prevention of Significant Deterioration (PSD)	No
Nonattainment New Source Review (NNSR)	No
Minor NSR	Yes

40 CFR Part 60 - New Source Performance Standards	Yes
40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants (NESHAPs)	Yes
40 CFR Part 63 - NESHAPs for Source Categories	Yes
Title IV (Acid Rain) of the Clean Air Act (CAA)	No
Title V (Federal Operating Permits) of the CAA	Yes
Title VI (Stratospheric Ozone Protection) of the CAA	No
CAIR (Clean Air Interstate Rule)	No

Basis for Applying Permit Shields

An operating permit applicant has the opportunity to specifically request a permit shield to document that specific applicable requirements do not apply to emission units in the permit. A permit shield is a special condition stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements. A permit shield has been requested in the application for specific emission units. For the permit shield requests that have been approved, the basis of determination for regulations that the owner/operator need not comply with are located in the "Permit Shield" attachment of the permit.

Insignificant Activities

In general, units not meeting the criteria for inclusion on either Form OP-SUM or Form OP-REQ1 are not required to be addressed in the operating permit application. Examples of these types of units include, but are not limited to, the following:

1. Office activities such as photocopying, blueprint copying, and photographic processes.
2. Sanitary sewage collection and treatment facilities other than those used to incinerate wastewater treatment plant sludge. Stacks or vents for sanitary sewer plumbing traps are also included.
3. Food preparation facilities including, but not limited to, restaurants and cafeterias used for preparing food or beverages primarily for consumption on the premises.
4. Outdoor barbecue pits, campfires, and fireplaces.
5. Laundry dryers, extractors, and tumblers processing bedding, clothing, or other fabric items generated primarily at the premises. This does not include emissions from dry cleaning systems using perchloroethylene or petroleum solvents.
6. Facilities storing only dry, sweet natural gas, including natural gas pressure regulator vents.
7. Any air separation or other industrial gas production, storage, or packaging facility. Industrial gases, for purposes of this list, include only oxygen, nitrogen, helium, neon, argon, krypton, and xenon.
8. Storage and handling of sealed portable containers, cylinders, or sealed drums.
9. Vehicle exhaust from maintenance or repair shops.
10. Storage and use of non-VOC products or equipment for maintaining motor vehicles operated at the site (including but not limited to, antifreeze and fuel additives).
11. Air contaminant detectors and recorders, combustion controllers and shut-off devices, product analyzers, laboratory analyzers, continuous emissions monitors, other analyzers and monitors, and emissions associated with sampling activities. Exception to this category includes sampling activities that are deemed fugitive emissions and under a regulatory leak detection and repair program.
12. Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including but not limited to, assorted vacuum producing devices and laboratory fume hoods.

13. Steam vents, steam leaks, and steam safety relief valves, provided the steam (or boiler feed water) has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
14. Storage of water that has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
15. Well cellars.
16. Fire or emergency response equipment and training, including but not limited to, use of fire control equipment including equipment testing and training and open burning of materials or fuels associated with firefighting training.
17. Crucible or pot furnaces with a brim full capacity of less than 450 cubic inches of any molten metal.
18. Equipment used exclusively for the melting or application of wax.
19. All closed tumblers used for the cleaning or deburring of metal products without abrasive blasting, and all open tumblers with a batch capacity of 1,000 lbs. or less.
20. Shell core and shell mold manufacturing machines.
21. Sand or investment molds with a capacity of 100 lbs. or less used for the casting of metals;
22. Equipment used for inspection of metal products.
23. Equipment used exclusively for rolling, forging, pressing, drawing, spinning, or extruding either hot or cold metals by some mechanical means.
24. Instrument systems utilizing air, natural gas, nitrogen, oxygen, carbon dioxide, helium, neon, argon, krypton, and xenon.
25. Battery recharging areas.
26. Brazing, soldering, or welding equipment.

Determination of Applicable Requirements

The tables below include the applicability determinations for the emission units, the index number(s) where applicable and all relevant unit attribute information used to form the basis of the applicability determination. The unit attribute information is a description of the physical properties of an emission unit which is used to determine the requirements to which the permit holder must comply. For more information about the descriptions of the unit attributes specific Unit Attribute Forms may be viewed at www.tceq.texas.gov/permitting/air/nav/air_all_ua_forms.html.

A list of unit attribute forms is included at the end of this document. Some examples of unit attributes include construction date; product stored in a tank; boiler fuel type; etc.. Generally, multiple attributes are needed to determine the requirements for a given emission unit and index number. The table below lists these attributes in the column entitled "Basis of Determination." Attributes that demonstrate that an applicable requirement applies will be the factual basis for the specific citations in an applicable requirement that apply to a unit for that index number. The TCEQ Air Permits Division has developed flowcharts for determining applicability of state and federal regulations based on the unit attribute information in a Decision Support System (DSS). These flowcharts can be accessed via the internet at www.tceq.texas.gov/permitting/air/nav/air_supportsys.html. The Air Permits Division staff may also be contacted for assistance at (512) 239-1250.

The attributes for each unit and corresponding index number provide the basis for determining the specific legal citations in an applicable requirement that apply, including emission limitations or standards, monitoring, recordkeeping, and reporting. The rules were found to apply or not apply by using the unit attributes as answers to decision questions found in the flowcharts of the DSS. Some additional attributes indicate which legal citations of a rule apply. The legal citations that apply to each emission unit may be found in the Applicable Requirements Summary table of the draft permit. There may be some entries or rows of units and rules not found in the permit, or if the permit contains a permit shield, repeated in the permit shield area. These are sets of attributes that describe negative applicability, or; in other words, the reason why a potentially applicable requirement does not apply.

If applicability determinations have been made which differ from the available flowcharts, an explanation of the decisions involved in the applicability determination is specified in the column "Changes and Exceptions to RRT." If there were no exceptions to the DSS, then this column has been removed.

The draft permit includes all emission limitations or standards, monitoring, recordkeeping and reporting required by each applicable requirement. If an applicable requirement does not require monitoring, recordkeeping, or reporting, the word "None" will appear in the Applicable Requirements Summary table. If additional periodic monitoring is required for an applicable requirement, it will be explained in detail in the portion of this document entitled "Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected."

When attributes demonstrate that a unit is not subject to an applicable requirement, the applicant may request a permit shield for those items. The portion of this document entitled "Basis for Applying Permit Shields" specifies which units, if any, have a permit shield.

Operational Flexibility
When an emission unit has multiple operating scenarios, it will have a different index number associated with each operating condition. This means that units are permitted to operate under multiple operating conditions. The applicable requirements for each operating condition are determined by a unique set of unit attributes. For example, a tank may store two different products at different points in time. The tank may, therefore, need to comply with two distinct sets of requirements, depending on the product that is stored. Both sets of requirements are included in the permit, so that the permit holder may store either product in the tank.

Determination of Applicable Requirements

Unit ID	Regulation	Index Number	Basis of Determination*
AIRCOMP048	30 TAC Chapter 117, Subchapter B	R7ICI-3	Type of Service = New, modified, reconstructed or relocated diesel fuel-fired engine, placed into service on or after October 1, 2001, located in the Houston/Galveston/Brazoria ozone nonattainment area, operated less than 100 hours/year, on a rolling 12-month average
AIRCOMP048	40 CFR Part 60, Subpart IIII	60IIII-1	Applicability Date = Stationary CI ICE commenced construction, reconstruction, or modification after July 11, 2005. Diesel = Diesel fuel is used. Kilowatts = Power rating is greater than or equal to 75 KW and less than 130 KW. Exemptions = The CI ICE is not exempt due to national security, testing at an engine test cell/stand or as a temporary replacement. Filter = The CI ICE is not equipped with a diesel particulate filter. Displacement = Displacement is less than 10 liters per cylinder. Service = CI ICE is a non-emergency engine. Commencing = CI ICE that is commencing new construction. Compliance Option = The CI ICE and control device is installed, configured, operated, and maintained according to the manufacturer's emission-related written instructions. Manufacture Date = Date of manufacture is after 04/01/2006. Model Year = CI ICE was manufactured in model year 2012.
AIRCOMP048	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-3	HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2. Brake HP = Stationary RICE with a brake hp greater than or equal to 100 and less than 250 hp. Construction/Reconstruction Date = Commenced construction or reconstruction on or after June 12, 2006. Service Type = Limited use.
DO-EMGEN	30 TAC Chapter 117, Subchapter B	R7ICI-1	Type of Service = Existing diesel fuel-fired engine, located in the Houston/Galveston/Brazoria ozone nonattainment area, operated less than 100 hours/year, on a rolling 12-month average that has not been modified, reconstructed or relocated on or after October 1, 2001
DO-EMGEN	40 CFR Part 60, Subpart IIII	60IIII-1	Applicability Date = Stationary CI ICE commenced construction, reconstruction, or modification on or before July 11, 2005.
DO-EMGEN	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-1	HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2. Brake HP = Stationary RICE with a brake hp greater than or equal to 100 and less than 250 hp. Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002. Service Type = Emergency use where the RICE does not operate or is not contractually obligated to be available for more than 15 hours per calendar year as specified in 40 CFR §63.6640(f)(2)(ii)-(iii) or does not operate as specified in 40 CFR §63.6640(f)(4)(ii). Stationary RICE Type = Compression ignition engine
GRP-EMENG	30 TAC Chapter 117, Subchapter B	R7ICI-1	Type of Service = Existing diesel fuel-fired engine, located in the Houston/Galveston/Brazoria ozone nonattainment area, operated less than 100 hours/year, on a rolling 12-month average that has not been modified, reconstructed or relocated on or after October 1, 2001
GRP-EMENG	40 CFR Part 60, Subpart IIII	60IIII-1	Applicability Date = Stationary CI ICE commenced construction, reconstruction, or modification on or before July 11, 2005.
GRP-EMENG	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-1	HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.

Unit ID	Regulation	Index Number	Basis of Determination*
			Brake HP = Stationary RICE with a brake hp greater than or equal to 300 hp and less than or equal to 500 hp. Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002. Service Type = Emergency use where the RICE does not operate or is not contractually obligated to be available for more than 15 hours per calendar year as specified in 40 CFR §63.6640(f)(2)(ii)-(iii) or does not operate as specified in 40 CFR §63.6640(f)(4)(ii). Stationary RICE Type = Compression ignition engine
UTGA416C	30 TAC Chapter 117, Subchapter B	R7ICI-2	Fuel Flow Monitoring = Unit is a diesel engine operating with a run time meter and using monthly fuel use records maintained for each engine per 30 TAC §§ 117.140(a)(2)(C), 117.340(a)(2)(C) or 117.440(a)(2)(C). NOx Emission Limitation = Title 30 TAC §§ 117.310(d)(3) and 117.310(a)(9) CO Emission Limitation = Title 30 TAC § 117.310(c)(1) 3 g/hp-hr option CO Averaging Method = Complying with the applicable emission limit using a block one-hour average. CO Monitoring System = Emissions monitored by means other than a CEMS or PEMS. EGF System Cap Unit = Engine is not used as an electric generating facility to generate electricity for sale to the electric grid. Type of Service = SRIC engine not meeting an exemption Fuel Fired = Petroleum-based diesel fuel NOx Averaging Method = Complying with the applicable emission limit using a block one-hour average. Engine Type = Lean-burn NOx Reduction = None ESAD Date Placed in Service = Installed, modified, reconstructed or relocated on or after October 1, 2002, but before October 1, 2003. NOx Monitoring System = Maximum emission rate testing in accordance with 30 TAC § 117.8000 Diesel HP Rating = Horsepower rating is 300 hp or greater, but less than 600 hp.
UTGA416C	40 CFR Part 60, Subpart IIII	60III-5	Applicability Date = Stationary CI ICE commenced construction, reconstruction, or modification on or before July 11, 2005.
UTGA416C	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-2	HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2. Brake HP = Stationary RICE with a brake hp greater than or equal to 300 hp and less than or equal to 500 hp. Construction/Reconstruction Date = Commenced construction or reconstruction on or after December 19, 2002, but before June 12, 2006. Service Type = Emergency use where the RICE does not operate or is not contractually obligated to be available for more than 15 hours per calendar year as specified in 40 CFR §63.6640(f)(2)(ii)-(iii) or does not operate as specified in 40 CFR §63.6640(f)(4)(ii).
GRP-POLYTK	30 TAC Chapter 115, Storage of VOCs	R5112-a13	Today's Date = Today's date is March 1, 2013 or later. Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank does not require emission controls True Vapor Pressure = True vapor pressure is less than 1.0 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons
GRP-SMWWTK2	30 TAC Chapter 115, Storage of VOCs	R5112-a4	Today's Date = Today's date is March 1, 2013 or later. Tank Description = Tank does not require emission controls

Unit ID	Regulation	Index Number	Basis of Determination*
			True Vapor Pressure = True vapor pressure is less than 1.0 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons
GRP-WWTRT	30 TAC Chapter 115, Storage of VOCs	R5112-a3	Today's Date = Today's date is March 1, 2013 or later. Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank does not require emission controls True Vapor Pressure = True vapor pressure is less than 1.0 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 40,000 gallons
GRP-WWTRT	40 CFR Part 60, Subpart Kb	60Kb-40K+	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is less than 0.5 psia
GRP-WWTRT2	30 TAC Chapter 115, Storage of VOCs	R5112-a9	Today's Date = Today's date is March 1, 2013 or later. Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank does not require emission controls True Vapor Pressure = True vapor pressure is less than 1.0 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 40,000 gallons
GRP-WWTRT2	40 CFR Part 60, Subpart Kb	60Kb-2040	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 19,800 gallons (75,000 liters) but less than 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is less than 2.2 psia
GRP-WWTRT3	30 TAC Chapter 115, Storage of VOCs	R5112-a21	Today's Date = Today's date is March 1, 2013 or later. Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank does not require emission controls True Vapor Pressure = True vapor pressure is less than 1.0 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons
GRP-WWTRT3	40 CFR Part 60, Subpart Kb	60Kb-2040	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 19,800 gallons (75,000 liters) but less than 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is less than 2.2 psia
S5-T158	30 TAC Chapter 115, Storage of VOCs	R5112-a1	Today's Date = Today's date is March 1, 2013 or later. Tank Description = Tank does not require emission controls True Vapor Pressure = True vapor pressure is less than 1.0 psia

Unit ID	Regulation	Index Number	Basis of Determination*
			Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 25,000 gallons but less than or equal to 40,000 gallons
S5-T704	30 TAC Chapter 115, Storage of VOCs	R5112-a2	Today's Date = Today's date is March 1, 2013 or later. Tank Description = Tank does not require emission controls True Vapor Pressure = True vapor pressure is less than 1.0 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons
WT-T1130	30 TAC Chapter 115, Storage of VOCs	R5112-a12	Today's Date = Today's date is March 1, 2013 or later. Tank Description = Tank does not require emission controls True Vapor Pressure = True vapor pressure is less than 1.0 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 40,000 gallons
WT-T1130	40 CFR Part 60, Subpart Kb	60Kb-40K+	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is less than 0.5 psia
WT-T503	30 TAC Chapter 115, Storage of VOCs	R5112-a17	Today's Date = Today's date is March 1, 2013 or later. Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is less than or equal to 1,000 gallons
WT-T507	30 TAC Chapter 115, Storage of VOCs	R5112-a18	Today's Date = Today's date is March 1, 2013 or later. Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is less than or equal to 1,000 gallons
WT-T510	30 TAC Chapter 115, Storage of VOCs	R5112-a19	Today's Date = Today's date is March 1, 2013 or later. Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is less than or equal to 1,000 gallons
WT-T513	30 TAC Chapter 115, Storage of VOCs	R5112-a20	Today's Date = Today's date is March 1, 2013 or later. Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is less than or equal to 1,000 gallons
WT-T604	30 TAC Chapter 115, Storage of VOCs	R5112-a23	Today's Date = Today's date is March 1, 2013 or later. Tank Description = Tank does not require emission controls True Vapor Pressure = True vapor pressure is less than 1.0 psia Product Stored = VOC other than crude oil or condensate

Unit ID	Regulation	Index Number	Basis of Determination*
			Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons
WT-T604	40 CFR Part 60, Subpart Kb	60Kb-1020	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 10,600 gallons (40,000 liters) but less than 19,800 gallons (75,000 liters)
WT-T703	30 TAC Chapter 115, Storage of VOCs	R5112-a25	Today's Date = Today's date is March 1, 2013 or later. Tank Description = Tank does not require emission controls True Vapor Pressure = True vapor pressure is less than 1.0 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 25,000 gallons but less than or equal to 40,000 gallons
WT-T703	40 CFR Part 60, Subpart Kb	60Kb-40K+	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is less than 0.5 psia
UT-V9T003	30 TAC Chapter 115, Loading and Unloading of VOC	R5217-a2	Chapter 115 Facility Type = Motor vehicle fuel dispensing facility
WT-652LOAD	30 TAC Chapter 115, Loading and Unloading of VOC	R5217-a2	Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal. Alternate Control Requirement (ACR) = No alternate control requirements are being utilized. Product Transferred = Volatile organic compounds other than liquefied petroleum gas and gasoline. Transfer Type = Only loading. True Vapor Pressure = True vapor pressure greater than or equal to 0.5 psia. Daily Throughput = Loading less than 20,000 gallons per day.
UT-F2H1401	40 CFR Part 63, Subpart MMM	63MMM	Heat Exchange System = The heat exchange system is subject to the requirements of § 63.1362(f).
WP-S1111	30 TAC Chapter 115, Water Separation	R5131-2a3	Alternate Control Requirement = The executive director (or the EPA Administrator) has not approved an ACR or exemption criteria in accordance with 30 TAC § 115.910. Exemption = Water separator does not qualify for exemption. Emission Control Option = Vapor recovery system which satisfies the provisions of 30 TAC § 115.131. Control Device = Carbon adsorption system.
WP-S1133	30 TAC Chapter 115, Water Separation	R5131-2a1	Alternate Control Requirement = The executive director (or the EPA Administrator) has not approved an ACR or exemption criteria in accordance with 30 TAC § 115.910. Exemption = Water separator does not qualify for exemption. Emission Control Option = The compartment has all openings sealed and totally encloses the liquid contents with gauging and sampling devices that are vapor tight except when in use.
GRP-WWFLT	30 TAC Chapter 115, Vent Gas Controls	R5121-7a2A	Alternate Control Requirement = Alternate control is not used. Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source. Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent

Unit ID	Regulation	Index Number	Basis of Determination*
			stream originating from a non-combustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2. Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule. Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg). VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.
GRP-WWSEP	30 TAC Chapter 115, Vent Gas Controls	R5121-7a2A	Alternate Control Requirement = Alternate control is not used. Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source. Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a non-combustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2. Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule. Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg). VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.
GRP-SMWWTK	30 TAC Chapter 115, Industrial Wastewater	R5140-7(2)	Petroleum Refinery = The affected source category is not a petroleum refinery. Wastewater Component Type = A wastewater component that is exempted from the control requirements of 30 TAC § 115.142 because it handles only exempted wastewater streams under 30 TAC § 115.147(2). Alternate Control Requirement = An alternate control requirement (ACR) or exemption criteria in accordance with 30 TAC § 115.910 is not used. 90% Overall Control Option = The unit is complying with the control requirements of 30 TAC § 115.142. Safety Hazard Exemption = No safety hazard exemption has been requested or none has been approved.
GRP-SMWWTK2	30 TAC Chapter 115, Industrial Wastewater	R5140-7(2)	Petroleum Refinery = The affected source category is not a petroleum refinery. Wastewater Component Type = A wastewater component that is exempted from the control requirements of 30 TAC § 115.142 because it handles only exempted wastewater streams under 30 TAC § 115.147(2). Alternate Control Requirement = An alternate control requirement (ACR) or exemption criteria in accordance with 30 TAC § 115.910 is not used. 90% Overall Control Option = The unit is complying with the control requirements of 30 TAC § 115.142. Safety Hazard Exemption = No safety hazard exemption has been requested or none has been approved.
GRP-WW	30 TAC Chapter 115, Industrial Wastewater	R5140-7(2)	Petroleum Refinery = The affected source category is not a petroleum refinery. Wastewater Component Type = A wastewater component that is exempted from the control requirements of 30 TAC § 115.142 because it handles only exempted wastewater streams under 30 TAC § 115.147(2). Alternate Control Requirement = An alternate control requirement (ACR) or exemption criteria in accordance with 30 TAC § 115.910 is not used. 90% Overall Control Option = The unit is complying with the control requirements of 30 TAC § 115.142. Safety Hazard Exemption = No safety hazard exemption has been requested or none has been approved.

Unit ID	Regulation	Index Number	Basis of Determination*
GRP-WW2	30 TAC Chapter 115, Industrial Wastewater	R5140-7(2)	Petroleum Refinery = The affected source category is not a petroleum refinery. Wastewater Component Type = A properly operated biotreatment unit. Alternate Control Requirement = An alternate control requirement (ACR) or exemption criteria in accordance with 30 TAC § 115.910 is not used. 90% Overall Control Option = The unit is complying with the control requirements of 30 TAC § 115.142. Safety Hazard Exemption = No safety hazard exemption has been requested or none has been approved.
GRP-WWSEP	30 TAC Chapter 115, Industrial Wastewater	R5140-7(2)	Petroleum Refinery = The affected source category is not a petroleum refinery. Wastewater Component Type = A wastewater component that is exempted from the control requirements of 30 TAC § 115.142 because it handles only exempted wastewater streams under 30 TAC § 115.147(2). Alternate Control Requirement = An alternate control requirement (ACR) or exemption criteria in accordance with 30 TAC § 115.910 is not used. 90% Overall Control Option = The unit is complying with the control requirements of 30 TAC § 115.142. Safety Hazard Exemption = No safety hazard exemption has been requested or none has been approved.
GRP-WWTRT	30 TAC Chapter 115, Industrial Wastewater	R5140-7(2)	Petroleum Refinery = The affected source category is not a petroleum refinery. Wastewater Component Type = A wastewater component that is exempted from the control requirements of 30 TAC § 115.142 because it handles only exempted wastewater streams under 30 TAC § 115.147(2). Alternate Control Requirement = An alternate control requirement (ACR) or exemption criteria in accordance with 30 TAC § 115.910 is not used. 90% Overall Control Option = The unit is complying with the control requirements of 30 TAC § 115.142. Safety Hazard Exemption = No safety hazard exemption has been requested or none has been approved.
GRP-WWTRT2	30 TAC Chapter 115, Industrial Wastewater	R5140-7(2)	Petroleum Refinery = The affected source category is not a petroleum refinery. Wastewater Component Type = A wastewater component that is exempted from the control requirements of 30 TAC § 115.142 because it handles only exempted wastewater streams under 30 TAC § 115.147(2). Alternate Control Requirement = An alternate control requirement (ACR) or exemption criteria in accordance with 30 TAC § 115.910 is not used. 90% Overall Control Option = The unit is complying with the control requirements of 30 TAC § 115.142. Safety Hazard Exemption = No safety hazard exemption has been requested or none has been approved.
GRP-WWTRT3	30 TAC Chapter 115, Industrial Wastewater	R5140-7(2)	Petroleum Refinery = The affected source category is not a petroleum refinery. Wastewater Component Type = A wastewater component that is exempted from the control requirements of 30 TAC § 115.142 because it handles only exempted wastewater streams under 30 TAC § 115.147(2). Alternate Control Requirement = An alternate control requirement (ACR) or exemption criteria in accordance with 30 TAC § 115.910 is not used. 90% Overall Control Option = The unit is complying with the control requirements of 30 TAC § 115.142. Safety Hazard Exemption = No safety hazard exemption has been requested or none has been approved.
S5-T158	30 TAC Chapter 115, Industrial Wastewater	R5140-7(2)	Petroleum Refinery = The affected source category is not a petroleum refinery. Wastewater Component Type = A wastewater component that is exempted from the control requirements of 30 TAC § 115.142 because it handles only exempted wastewater streams under 30 TAC § 115.147(2).

Unit ID	Regulation	Index Number	Basis of Determination*
			Alternate Control Requirement = An alternate control requirement (ACR) or exemption criteria in accordance with 30 TAC § 115.910 is not used. 90% Overall Control Option = The unit is complying with the control requirements of 30 TAC § 115.142. Safety Hazard Exemption = No safety hazard exemption has been requested or none has been approved.
S5-T704	30 TAC Chapter 115, Industrial Wastewater	R5140-7(2)	Petroleum Refinery = The affected source category is not a petroleum refinery. Wastewater Component Type = A wastewater component that is exempted from the control requirements of 30 TAC § 115.142 because it handles only exempted wastewater streams under 30 TAC § 115.147(2). Alternate Control Requirement = An alternate control requirement (ACR) or exemption criteria in accordance with 30 TAC § 115.910 is not used. 90% Overall Control Option = The unit is complying with the control requirements of 30 TAC § 115.142. Safety Hazard Exemption = No safety hazard exemption has been requested or none has been approved.
WP-T1061	30 TAC Chapter 115, Industrial Wastewater	R5140-7(2)	Petroleum Refinery = The affected source category is not a petroleum refinery. Wastewater Component Type = A wastewater component that is exempted from the control requirements of 30 TAC § 115.142 because it handles only exempted wastewater streams under 30 TAC § 115.147(2). Alternate Control Requirement = An alternate control requirement (ACR) or exemption criteria in accordance with 30 TAC § 115.910 is not used. 90% Overall Control Option = The unit is complying with the control requirements of 30 TAC § 115.142. Safety Hazard Exemption = No safety hazard exemption has been requested or none has been approved.
WT-T604	30 TAC Chapter 115, Industrial Wastewater	R5140-7(2)	Petroleum Refinery = The affected source category is not a petroleum refinery. Wastewater Component Type = A wastewater component that is exempted from the control requirements of 30 TAC § 115.142 because it handles only exempted wastewater streams under 30 TAC § 115.147(2). Alternate Control Requirement = An alternate control requirement (ACR) or exemption criteria in accordance with 30 TAC § 115.910 is not used. 90% Overall Control Option = The unit is complying with the control requirements of 30 TAC § 115.142. Safety Hazard Exemption = No safety hazard exemption has been requested or none has been approved.
WT-T703	30 TAC Chapter 115, Industrial Wastewater	R5140-7(2)	Petroleum Refinery = The affected source category is not a petroleum refinery. Wastewater Component Type = A wastewater component that is exempted from the control requirements of 30 TAC § 115.142 because it handles only exempted wastewater streams under 30 TAC § 115.147(2). Alternate Control Requirement = An alternate control requirement (ACR) or exemption criteria in accordance with 30 TAC § 115.910 is not used. 90% Overall Control Option = The unit is complying with the control requirements of 30 TAC § 115.142. Safety Hazard Exemption = No safety hazard exemption has been requested or none has been approved.

* - The “unit attributes” or operating conditions that determine what requirements apply

NSR Versus Title V FOP

The state of Texas has two Air permitting programs, New Source Review (NSR) and Title V Federal Operating Permits. The two programs are substantially different both in intent and permit content.

NSR is a preconstruction permitting program authorized by the Texas Clean Air Act and Title I of the Federal Clean Air Act (FCAA). The processing of these permits is governed by 30 Texas Administrative Code (TAC) Chapter 116.111. The Title V Federal Operating Program is a federal program authorized under Title V of the FCAA that has been delegated to the state of Texas to administer and is governed by 30 TAC Chapter 122. The major differences between the two permitting programs are listed in the table below:

NSR Permit	Federal Operating Permit(FOP)
Issued Prior to new Construction or modification of an existing facility	For initial permit with application shield, can be issued after operation commences; significant revisions require approval prior to operation.
Authorizes air emissions	Codifies existing applicable requirements, does not authorize new emissions
Ensures issued permits are protective of the environment and human health by conducting a health effects review and that requirement for best available control technology (BACT) is implemented.	Applicable requirements listed in permit are used by the inspectors to ensure proper operation of the site as authorized. Ensures that adequate monitoring is in place to allow compliance determination with the FOP.
Up to two Public notices may be required. Opportunity for public comment and contested case hearings for some authorizations.	One public notice required. Opportunity for public comments. No contested case hearings.
Applies to all point source emissions in the state.	Applies to all major sources and some non-major sources identified by the EPA.
Applies to facilities: a portion of site or individual emission sources	One or multiple FOPs cover the entire site (consists of multiple facilities)
Permits include terms and conditions under which the applicant must construct and operate its various equipment and processes on a facility basis.	Permits include terms and conditions that specify the general operational requirements of the site; and also include codification of all applicable requirements for emission units at the site.
Opportunity for EPA review for Federal Prevention of Significant Deterioration (PSD) and Nonattainment (NA) permits for major sources.	Opportunity for EPA review, Affected states review, and a Public petition period for every FOP.
Permits have a table listing maximum emission limits for pollutants	Permit has an applicable requirements table and Periodic Monitoring (PM) / Compliance Assurance Monitoring (CAM) tables which document applicable monitoring requirements.
Permits can be altered or amended upon application by company. Permits must be issued before construction or modification of facilities can begin.	Permits can be revised through several revision processes, which provide for different levels of public notice and opportunity to comment. Changes that would be significant revisions require that a revised permit be issued before those changes can be operated.
NSR permits are issued independent of FOP requirements.	FOP are independent of NSR permits, but contain a list of all NSR permits incorporated by reference

New Source Review Requirements

Below is a list of the New Source Review (NSR) permits for the permitted area. These NSR permits are incorporated by reference into the operating permit and are enforceable under it. These permits can be found in the main TCEQ file room, located on the first floor of Building E, 12100 Park 35 Circle, Austin, Texas. The Public Education Program may be contacted at 1-800-687-4040 or the Air Permits Division (APD) may be contacted at 1-512-239-1250 for help with any question.

Additionally, the site contains emission units that are permitted by rule under the requirements of 30 TAC Chapter 106, Permits by Rule. The following table specifies the permits by rule that apply to the site. All current permits by rule are contained in Chapter 106. Outdated 30 TAC Chapter 106 permits by rule may be viewed at the following Web site:

www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/old106list/index106.html

Outdated Standard Exemption lists may be viewed at the following Web site:

www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/oldselist/se_index.html

The status of air permits and applications and a link to the Air Permits Remote Document Server is located at the following Web site:

www.tceq.texas.gov/permitting/air/nav/air_status_permits.html

Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.	
Authorization No.: 19694	Issuance Date: 11/29/2006
Authorization No.: 329A	Issuance Date: 03/03/2010
Permits By Rule (30 TAC Chapter 106) for the Application Area	
Number: 106.122	Version No./Date: 09/04/2000
Number: 106.262	Version No./Date: 09/04/2000
Number: 106.263	Version No./Date: 11/01/2001
Number: 106.371	Version No./Date: 09/04/2000
Number: 106.373	Version No./Date: 09/04/2000
Number: 106.452	Version No./Date: 09/04/2000
Number: 106.454	Version No./Date: 11/01/2001
Number: 106.472	Version No./Date: 09/04/2000
Number: 106.511	Version No./Date: 09/04/2000
Number: 106.532	Version No./Date: 09/04/2000
Number: 106.533	Version No./Date: 03/14/1997
Number: 8	Version No./Date: 11/05/1986
Number: 14	Version No./Date: 01/11/1985
Number: 51	Version No./Date: 11/05/1986

Number: 51	Version No./Date: 07/20/1992
Number: 61	Version No./Date: 07/20/1992
Number: 78	Version No./Date: 01/11/1985

Emission Units and Emission Points

In air permitting terminology, any source capable of generating emissions (for example, an engine or a sandblasting area) is called an Emission Unit. For purposes of Title V, emission units are specifically listed in the operating permit when they have applicable requirements other than New Source Review (NSR), or when they are listed in the permit shield table.

The actual physical location where the emissions enter the atmosphere (for example, an engine stack or a sand-blasting yard) is called an emission point. For New Source Review preconstruction permitting purposes, every emission unit has an associated emission point. Emission limits are listed in an NSR permit, associated with an emission point. This list of emission points and emission limits per pollutant is commonly referred to as the "Maximum Allowable Emission Rate Table", or "MAERT" for short. Specifically, the MAERT lists the Emission Point Number (EPN) that identifies the emission point, followed immediately by the Source Name, identifying the emission unit that is the source of those emissions on this table.

Thus, by reference, an emission unit in a Title V operating permit is linked by reference number to an NSR authorization, and its related emission point.

Monitoring Sufficiency

Federal and state rules, 40 CFR § 70.6(a)(3)(i)(B) and 30 TAC § 122.142(c) respectively, require that each federal operating permit include additional monitoring for applicable requirements that lack periodic or instrumental monitoring (which may include recordkeeping that serves as monitoring) that yields reliable data from a relevant time period that are representative of the emission unit's compliance with the applicable emission limitation or standard. Furthermore, the federal operating permit must include compliance assurance monitoring (CAM) requirements for emission sources that meet the applicability criteria of 40 CFR Part 64 in accordance with 40 CFR § 70.6(a)(3)(i)(A) and 30 TAC § 122.604(b).

With the exception of any emission units listed in the Periodic Monitoring or CAM Summaries in the FOP, the TCEQ Executive Director has determined that the permit contains sufficient monitoring, testing, recordkeeping, and reporting requirements that assure compliance with the applicable requirements. If applicable, each emission unit that requires additional monitoring in the form of periodic monitoring or CAM is described in further detail under the Rationale for CAM/PM Methods Selected section following this paragraph.

Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected

Periodic Monitoring:

The Federal Clean Air Act requires that each federal operating permit include monitoring sufficient to assure compliance with the terms and conditions of the permit. Most of the emission limits and standards applicable to emission units at Title V sources include adequate monitoring to show that the units meet the limits and standards. For those requirements that do not include monitoring, or where the monitoring is not sufficient to assure compliance, the federal operating permit must include such monitoring for the emission units affected. The following emission units are subject to periodic monitoring requirements because the emission units are

subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement that does not already require monitoring, or the monitoring for the applicable requirement is not sufficient to assure compliance:

Unit/Group/Process Information	
ID No.: WP-S1133	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Water Separation	SOP Index No.: R5131-2a1
Pollutant: VOC	Main Standard: § 115.132(a)(1)
Monitoring Information	
Indicator: VOC Concentration	
Minimum Frequency: Quarterly	
Averaging Period: n/a*	
Deviation Limit: 10,000 ppmv maximum instrument monitoring for shaft seals; 500 ppmv maximum instrument monitoring for other leak interfaces	
Basis of monitoring: It is widely practiced and accepted to monitor the VOC concentration at the outlet of a control device by use of a portable analyzer with procedures such as EPA Test Method 25A or a VOC CEMS. The measured concentration along with stack flow rate or AP-42 factors and fuel consumption records may be used to demonstrate compliance with an underlying emission limit or standard. Outlet VOC concentration has been used as an indicator of VOC emissions in many federal rules including 40 CFR Part 60, Subpart III, 40 CFR Part 60, Subpart NNN, 40 CFR Part 60, Subpart RRR, 40 CFR Part 61, Subpart BB, 40 CFR Part 61, Subpart FF, 40 CFR Part 63, Subpart R, 40 CFR Part 63, Subpart DD, and 40 CFR Part 63, Subpart HH.	

*The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

Compliance Review

1. In accordance with 30 TAC Chapter 60, the compliance history was reviewed on May 18, 2015.
   Site rating: 1.72 / Satisfactory Company rating: 1.72 / Satisfactory
   (High < 0.10; Satisfactory ≥ 0.10 and ≤ 55; Unsatisfactory > 55)
2. Has the permit changed on the basis of the compliance history or site/company rating? .....No

Site/Permit Area Compliance Status Review

1. Were there any out-of-compliance units listed on Form OP-ACPS? .....No
2. Is a compliance plan and schedule included in the permit?.....No

Available Unit Attribute Forms

OP-UA1 - Miscellaneous and Generic Unit Attributes
OP-UA2 - Stationary Reciprocating Internal Combustion Engine Attributes
OP-UA3 - Storage Tank/Vessel Attributes
OP-UA4 - Loading/Unloading Operations Attributes
OP-UA5 - Process Heater/Furnace Attributes
OP-UA6 - Boiler/Steam Generator/Steam Generating Unit Attributes
OP-UA7 - Flare Attributes
OP-UA8 - Coal Preparation Plant Attributes
OP-UA9 - Nonmetallic Mineral Process Plant Attributes
OP-UA10 - Gas Sweetening/Sulfur Recovery Unit Attributes
OP-UA11 - Stationary Turbine Attributes
OP-UA12 - Fugitive Emission Unit Attributes
OP-UA13 - Industrial Process Cooling Tower Attributes
OP-UA14 - Water Separator Attributes
OP-UA15 - Emission Point/Stationary Vent/Distillation Operation/Process Vent Attributes
OP-UA16 - Solvent Degreasing Machine Attributes
OP-UA17 - Distillation Unit Attributes
OP-UA18 - Surface Coating Operations Attributes
OP-UA19 - Wastewater Unit Attributes
OP-UA20 - Asphalt Operations Attributes
OP-UA21 - Grain Elevator Attributes
OP-UA22 - Printing Attributes
OP-UA24 - Wool Fiberglass Insulation Manufacturing Plant Attributes
OP-UA25 - Synthetic Fiber Production Attributes
OP-UA26 - Electroplating and Anodizing Unit Attributes
OP-UA27 - Nitric Acid Manufacturing Attributes
OP-UA28 - Polymer Manufacturing Attributes
OP-UA29 - Glass Manufacturing Unit Attributes
OP-UA30 - Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mill Attributes
OP-UA31 - Lead Smelting Attributes
OP-UA32 - Copper and Zinc Smelting/Brass and Bronze Production Attributes
OP-UA33 - Metallic Mineral Processing Plant Attributes
OP-UA34 - Pharmaceutical Manufacturing
OP-UA35 - Incinerator Attributes
OP-UA36 - Steel Plant Unit Attributes
OP-UA37 - Basic Oxygen Process Furnace Unit Attributes
OP-UA38 - Lead-Acid Battery Manufacturing Plant Attributes
OP-UA39 - Sterilization Source Attributes
OP-UA40 - Ferroalloy Production Facility Attributes
OP-UA41 - Dry Cleaning Facility Attributes

OP-UA42 - Phosphate Fertilizer Manufacturing Attributes
OP-UA43 - Sulfuric Acid Production Attributes
OP-UA44 - Municipal Solid Waste Landfill/Waste Disposal Site Attributes
OP-UA45 - Surface Impoundment Attributes
OP-UA46 - Epoxy Resins and Non-Nylon Polyamides Production Attributes
OP-UA47 - Ship Building and Ship Repair Unit Attributes
OP-UA48 - Air Oxidation Unit Process Attributes
OP-UA49 - Vacuum-Producing System Attributes
OP-UA50 - Fluid Catalytic Cracking Unit Catalyst Regenerator/Fuel Gas Combustion Device/Claus Sulfur Recovery Plant Attributes
OP-UA51 - Dryer/Kiln/Oven Attributes
OP-UA52 - Closed Vent Systems and Control Devices
OP-UA53 - Beryllium Processing Attributes
OP-UA54 - Mercury Chlor-Alkali Cell Attributes
OP-UA55 - Transfer System Attributes
OP-UA56 - Vinyl Chloride Process Attributes
OP-UA57 - Cleaning/Depainting Operation Attributes
OP-UA58 - Treatment Process Attributes
OP-UA59 - Coke By-Product Recovery Plant Attributes
OP-UA60 - Chemical Manufacturing Process Unit Attributes
OP-UA61 - Pulp, Paper, or Paperboard Producing Process Attributes
OP-UA62 - Glycol Dehydration Unit Attributes
OP-UA63 - Vegetable Oil Production Attributes